

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
Richmond Division**

IN RE:

LeClairRyan PLLC

Case No.: 19-34574-KRH

Chapter 11

Debtor in Possession

**OBJECTION OF SUPER-SERVER, LLC
TO MOTION TO USE CASH COLLATERAL**

COMES NOW Super-Server, LLC d/b/a Proxios, by counsel ("Proxios"), and objects to the Debtor's Motion to Use Cash Collateral [Docket #13]. Proxios has reviewed the Interim Order entered by the Court as Docket # 41 and does not object to the form of the order. However, Proxios has requested but has not received a detailed budget reflecting the Debtor's proposed use of cash past September 27, 2017. Without an updated budget, no creditor or party in interest can evaluate the relief sought by the Debtor.

In addition, Proxios supports the Motion filed by the U.S. Trustee to convert the case to Chapter 7 and for the Chapter 7 Trustee to evaluate and propose a liquidation budget going forward in this case.

Karen M. Crowley (VSB # 35881)
Joseph T. Liberatore (VSB #32302)
CROWLEY LIBERATORE P.C.
150 Boush Street, Suite 300
Norfolk, VA 23510
Telephone (757) 333-4500
kcrowley@clrbfirm.com
Counsel for Super Server, LLC

WHEREFORE, for the reasons set forth above, Super-Server, LLC d/b/a Proxios requests that the Court deny the Motion to Use Cash Collateral absent circulation and approval of a proposed detailed budget to the creditors and parties in interest, and grant it such other and further relief as is just.

Date: September 19, 2019

Respectfully Submitted,

SUPER-SERVER, LLC

/s/ Karen M. Crowley

Of Counsel

Karen M. Crowley (VSB # 35881)
Joseph T. Liberatore (VSB #32302)
CROWLEY LIBERATORE P.C.
150 Boush Street, Suite 300
Norfolk, VA 23510
Telephone (757) 333-4500
kcrowley@clrbfirm.com
Counsel for Super Server, LLC

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Objection was served on September 19, 2019, by electronic mail, to those listed on the attached Core Service List with an e-mail address and by first class mail upon those listed on the attached Core Service List without an e-mail address.

/s/ Karen M. Crowley